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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR REPLY IN
SUPPORT OF MOTION FOR RELIEF
FROM AND EMERGENCY MOTION
FOR STAY OF NON-DISPOSITIVE
PRETRIAL ORDER OF MAGISTRATE
JUDGE (DKT. 881)**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Seal Portions of Their Reply in Support of Motion for Relief from and Emergency Motion for Stay of
8 Non-Dispositive Pretrial Order of Magistrate Judge (Dkt. 881) (the “Administrative Motion”). The
9 Administrative Motion seeks an order sealing highlighted portions of Defendants’ Reply in Support of
10 Motion for Relief from and Emergency Motion for Stay of Non-Dispositive Pretrial Order of
11 Magistrate Judge (“Uber’s Reply”) and of Exhibit A.

12 3. The green highlighted portions of Uber’s Reply contain or reference trade secret and
13 confidential business information, which Waymo seeks to seal.

14 4. Uber’s Reply (green highlighted portions) contain, reference, and/or describe Waymo’s
15 asserted trade secrets. The information Waymo seeks to seal includes the confidential design and
16 functionality of Waymo’s proprietary autonomous vehicle system, which Waymo maintains as secret.
17 I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and are valuable
18 as trade secrets to Waymo’s business (Dkt. 25-31). The public disclosure of this information would
19 give Waymo’s competitors access to descriptions of the functionality or features of Waymo’s
20 autonomous vehicle system. If such information were made public, I understand that Waymo’s
21 competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Reply that
23 merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on July 28, 2017.

4 By /s/ Felipe Corredor

5 Felipe Corredor

6 Attorneys for WAYMO LLC

7
8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

11
12 By: /s/ Charles K. Verhoeven

13 Charles K. Verhoeven